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Attorneys for Defendant

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

AEDES DE VENUSTAS, INC.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Action No.: 1:07-04530 (LTS)
	:	
VENUSTAS INTERNATIONAL, LLC,	:	
	:	
Defendant.	:	

DECLARATION OF ROBERT G. SHEPHERD, ESQ.

Robert G. Shepherd hereby declares as follows:

1. I am a member of the law firm of Mathews, Shepherd, McKay & Bruneau, P.A., and am one of the attorneys of record for defendant, Venustas International, LLC. As such, I have personal knowledge of the matters set forth herein and, if called to testify, I could and would competently testify thereto.

2. The parties agreed at the June 1, 2007 Court hearing that the matter would proceed as an application for preliminary injunction.

3. Attached hereto as Exhibit 1 is a true copy of relevant portions of Sam Ghusson's June 12, 2007 deposition transcript.

4. Venustas International, LLC changed its name to Batallure Beauty LLC.

5. Attached hereto as Exhibit 2 is the January 29, 2008 subpoena that plaintiff served on Allen Silk, Esq.

6. Plaintiff's counsel, in discussing the subpoena with me, has stated that the purpose of the subpoena is to gather additional evidence on the issue of whether defendant's adoption of the trade name was in good faith.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed On: 2/11/08 (date)



Robert G. Shepherd